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6 *Representing the United States of America*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 ANDREW ROBERT REGGUINTI,

13 Defendant.

Case No. 2:18-cr-00347-JCM-NJK

**STIPULATION TO CONTINUE
RESPONSE DEADLINE**
Second Request

14 IT IS HEREBY STIPULATED AND AGREED, by and between, the United States of
15 America, through the undersigned, together with Raquel Lazo, counsel for defendant
16 ANDREW ROBERT REGGUINIT, that the response to the Defendant's Motion to Suppress
17 (Docket 23), currently due April 19, 2019, be vacated and reset to a date and time convenient to
18 the Court but no sooner than two weeks.

19 This stipulation is entered into for the following reasons:

- 20 1. Counsel for the government has been out of district.
21 2. Negotiations continue between the parties.
22 3. Additionally, denial of this request for continuance could result in a
23 miscarriage of justice.
24

1 4. The additional time requested by this Stipulation is made in good faith and not
2 for purposes of delay.

3 DATED this 18th day of April, 2019.

4
5 NICHOLAS A. TRUTANICH
UNITED STATES ATTORNEY

6 */s/ Robert A. Knief*

7 _____
ROBERT A. KNIEF
Assistant United States Attorneys

/s/ Raquel Lazo

RAQUEL LAZO
Counsel for Defendant Andrew Regginti

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

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ORDER

8 The ends of justice served by granting said continuance outweigh the best interest of the
9 public and the defendant in a speedy sentencing, since the failure to grant said continuance
10 would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time
11 and the opportunity within which to be able to effectively and thoroughly prepare for trial,
12 taking into account the exercise of due diligence.

13 IT IS THEREFORE ORDERED that the deadline for the Government's Response to
14 Defendant's Motion to Suppress , scheduled for April 19 , 2019, be vacated and continued to
15 May 3, 2019.

16 IT IS SO ORDERED.

17 Entered: April 18, 2019

18 
NANCY J. KOPPE
United States Magistrate Judge